

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 20-CR-712-SRC
)	
COURTNEY CURTIS,)	
)	
Defendant.)	

**DEFENDANT’S MOTION TO CONTINUE MARCH 2, 2021
SENTENCING TO THE MAY, 2021 DOCKET**

Comes now Defendant, by his attorney, John D. Stobbs II, and for his Motion to Continue March 2, 2021 Sentencing to the May, 2021 Docket states:

1. The undersigned was appointed to represent Defendant on January 27, 2021 and entered his appearance on January 28, 2021.
2. On February 4, 2021 the undersigned picked up Defendant’s file from his previous attorney Talmage E. Newton, IV.
3. Subsequent to his appointment, the undersigned ordered transcripts of all pertinent hearings.
4. The undersigned finished reviewing the transcripts on February 9, 2021.
5. The *only* matter pending at the present time is the Sentencing which was continued to March 3, 2021.
6. The undersigned spoke extensively once with Defendant by telephone and another time for a brief introductory conversation.
7. In order for the undersigned to provide adequate representation to Defendant he has to meet with and confer with him in person.
8. Defendant does not have the ability to travel from his residence in Ferguson, Missouri to the undersigned’s office in Alton, Illinois.

9. After learning of Defendant's inability to make the 15 minute drive to the undersigned's office, the undersigned spoke with Defendant's pre-trial officer who indicated that his office will provide a metrolink ticket for Defendant to travel from Ferguson, Missouri to the federal courthouse downtown.

10. An interview has been scheduled with Defendant and the undersigned at the federal courthouse downtown for February 17, 2021. The undersigned has notified Defendant of this meeting by way of letter sent earlier this date.

11. The undersigned intends to meet with Defendant during the weeks of February 20, 2021 and February 27, 2021 at the federal courthouse downtown.

12. While the undersigned was appointed to represent Defendant for Sentencing, there might be Motions Defendant desires to be filed which will require research and preparation. By the middle of March, 2021 the undersigned will have filed whatever Motion Defendant wants filed, or not file a Motion.

13. Per the Plea Agreement, and Motion For Variance must be filed within 10 days of Sentencing. If the Sentencing is reset for May that will give ample time to prepare whatever Motions Defendant desires to be prepared and to prepare a Motion For Variance.

14. The undersigned will be out of his office on April 15, 2021 and April 16, 2021 attending the White House Retreat. He then will be out of his office April 19, 2021 through April 23, 2021 on a pre-planned, pre-paid trip to Miami, Florida.

15. The undersigned will be in trial during the weeks of May 3, 2021 and May 17, 2021 in the matters of *Illinois v. Varble* and *Illinois v. James* respectively.

16. The undersigned is cognizant that this case has rattled on for some time and has no intention of continuing the Sentencing beyond the May, 2021 date.

17. Regardless of what Defendant wants to do vis-à-vis Motions, setting the matter in May of 2021 means that the case will be resolved in May.

WHEREFORE, Defendant requests that the March 2, 2021 Sentencing be continued to May of 2021.

COURTNEY CURTIS

STOBBS LAW OFFICES

BY:

/s/John D. Stobbs II

John D. Stobbs II, No. 43052

E.D.Mo. Number 40623

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2021, a copy of the attached *Defendant's Motion to Continue March 2, 2021 Sentencing to May, 2021 Docket* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Hal Goldsmith
Assistant U.S. Attorney
111 S. 10th Street
St. Louis, Missouri 63102

STOBBS LAW OFFICES

/s/ John D. Stobbs II
Attorney for Defendant
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